

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PETRÓLEOS DE VENEZUELA, S.A., PDVSA  
PETRÓLEO, S.A., and PDV HOLDING, INC.,

Plaintiffs and Counterclaim Defendants,

- against -

MUFG UNION BANK, N.A. and GLAS  
AMERICAS LLC,

Defendants and Counterclaim Plaintiffs.

No. 19 Civ. 10023 (KPF)

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that upon the annexed Declarations of Andrew N. Rosenberg and Jonathan H. Hurwitz, the exhibits attached thereto, and the accompanying Memorandum of Law, Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. (the “Trustee”)<sup>1</sup> and GLAS Americas LLC (the “Collateral Agent”), hereby move this Court pursuant to Federal Rule of Civil Procedure 62(b), before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, Courtroom 618, New York, New York 10007, for an order modifying the partial stay of execution of enforcement entered on December 29, 2020 (ECF No. 241).

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<sup>1</sup> The Trustee, MUFG Union Bank, N.A., merged into U.S. Bank National Association, effective May 26, 2023, with U.S. Bank National Association as the surviving entity.

Dated: New York, New York  
June 28, 2023

Respectfully submitted,

LATHAM & WATKINS LLP  
Matthew S. Salerno  
1271 Avenue of the Americas  
New York, New York 10020-1300  
Telephone: 212-906-1200  
Facsimile: 212-751-4864  
matthew.salerno@lw.com

*Attorneys for Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. and GLAS Americas LLC, in their respective capacities as Trustee and Collateral Agent, under the Indenture dated October 27, 2016, and the Pledge and Security Agreement dated October 28, 2016, governing PDVSA's Senior Secured Notes due 2020*

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP

By: s/ Walter Rieman  
Walter Rieman  
Jonathan H. Hurwitz  
Shane D. Avidan  
1285 Avenue of the Americas  
New York, New York 10019-6064  
Telephone: 212-373-3000  
Facsimile: 212-757-3990  
wrieman@paulweiss.com  
jhurwitz@paulweiss.com  
savidan@paulweiss.com

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP  
Roberto J. Gonzalez (*pro hac vice*)  
2001 K Street, NW  
Washington, DC 20006-1047  
Telephone: 202-223-7300  
rgonzalez@paulweiss.com

*Attorneys for Defendants and Counterclaim Plaintiffs MUFG Union Bank, N.A. and GLAS Americas LLC, in their respective capacities as Trustee and Collateral Agent, under the Indenture dated October 27, 2016, and the Pledge and Security Agreement dated October 28, 2016, governing PDVSA's Senior Secured Notes due 2020 (as to Federal and New York law issues only)*